

Remarks

In the Office Action of April 18, 2005, the Examiner rejected claims 8 and 13 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,825,772 to Dobbins et al. ("Dobbins"); rejected claims 1-5, 7-11, and 13-17 under 35 U.S.C. § 102(e) based on U.S. Patent No. 6,826,176 to Siddiqui et al. ("Siddiqui"); and rejected claims 6, 12, and 18 under 35 U.S.C. § 103(a) based on Siddiqui in view of U.S. Patent No. 6,101,189 to Tsuruoka ("Tsuruoka").

By this Amendment, applicants have amended claims 1, 8, and 13 to improve form. Claims 1-18 remain pending.

Claims 8 and 13 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Dobbins. For at least the following reasons, Applicants respectfully traverse this rejection.

Amended claim 8 is directed to a method of processing packets in a network device. The method includes receiving a packet at one of a plurality of receive ports in the network device, the packet including address information that indicates at least a destination subnet for the packet. The method further includes identifying, via a configuration table, one or more output ports in the network device for the packet based on the address information, and forwarding the packet to the destination subnet via the identified one or more output ports. Still further, the method includes allowing a remote processor to remotely

configure the configuration table, the remote processor transmitting information to configure the configuration table using an IP address uniquely assigned to the network device.

A proper rejection under 35 U.S.C. § 102 requires that a single reference teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present.

Dobbins does not disclose each of the features recited in amended claim 8. Dobbins, for example, completely fails to disclose or suggest, as is recited in claim 8, allowing a remote processor to remotely configure the configuration table, the remote processor transmitting information to configure the configuration table using an IP address uniquely assigned to the network device. In rejecting a related feature in the previous version of claim 8, the Examiner pointed to a number of features in Dobbins as allegedly corresponding to this feature, including Figs. 15 and 16 and the corresponding textual description in Dobbins. (Office Action, page 3).

Fig. 15 of Dobbins illustrates a VLAN domain in which a plurality of VLAN switches 141 and 142 are managed by a VLAN management application 143. (Dobbins, column 19, lines 62-64). The Examiner appears to contend that the VLAN management application 143 corresponds to the functionality corresponding to the remote processor recited in claim 8. In this respect, Dobbins discloses: “[t]he management application 143 communicates with each

switch on links 147 via the SNMP (Simple Network Management Protocol) messaging protocol. The switches may contain SMNP MIBs for element management and remote control of the switch elements.” (Dobbins, column 20, lines 1-6). Although this section of Dobbins may disclose that switches in Dobbins are generally “remote controlled” by management application 143, management application 143 of Dobbins is in no way disclosed or suggested as, for example, being able to “remotely configure the configuration table,” as recited in claim 8, or “transmitting information to configure the configuration table using an IP address uniquely assigned to the network device,” as is also recited in claim 8.

Fig. 16 of Dobbins illustrates a representative network topology built with six secure fast packet switches. (Dobbins, column 20, lines 12-14). Fig. 16 also illustrates a “network management station.” This network management station of Dobbins, however, is not, as is recited in claim 8, able to “remotely configure the configuration table” or transmit “information to configure the configuration table using an IP address uniquely assigned to the network device.”

For at least these reasons, Applicants submit that Dobbins does not disclose each feature recited in claim 8, and the rejection of this claim should accordingly be withdrawn.

Claim 13 additionally stands rejected based on Dobbins under 35 U.S.C. § 102(b).

Amended claim 13 is directed to a network device for routing packets received in a packet-switched network. The device includes means for receiving the packets from the network, each of the packets having information that includes at least destination information that indicates an intended destination subnet for the packet. The device further includes a configuration table storing associations between Internet Protocol (IP) addresses of subnets and output ports of the multiport switch, the configuration table being remotely updated to reflect configuration information received from a remote processor. The device of claim 13 further includes means for determining appropriate output ports in the network device for the received packets based on the destination information and the configuration table and transmit means for transmitting the packets from the output ports determined by the means for determining.

Applicants submit that Dobbins fails to disclose each of the features recited in claim 13. Dobbins, for instance, does not disclose, as is recited in claim 13, a configuration table storing associations between Internet Protocol (IP) addresses of subnets and output ports of the multiport switch, the configuration table being remotely updated to reflect configuration information received from a remote processor. As previously discussed, Dobbins discloses a management application 143 (Fig. 15) and a network management station (Fig. 16). Neither the management application 143 nor the network management station of Dobbins, however, can be said to provide for remote updating of a configuration

table in a multiport switch, as recited in claim 13. Accordingly, Dobbins does not disclose or suggest each of the features recited in claim 13 and the rejection of this claim should be withdrawn.

Claims 1-5, 7-11, and 13-17 stand rejected under 35 U.S.C. § 102(e) based on Siddiqui. For the following reasons, Applicants respectfully traverse this rejection.

Claim 1, as amended, is directed to a system for transmitting packets of information. The system includes a multiport switch, a host processor, and a remote processor. The multiport switch is connected to a plurality of subnets through ports of the multiport switch, each of the plurality of subnets being associated with a subnet Internet Protocol (IP) address. The multiport switch further includes a configuration table storing associations between the subnet IP addresses and the ports of the multiport switch. The host processor is connected locally to the multiport switch and the remote processor communicates with the multiport switch through the host processor using an IP address assigned to the multiport switch. The remote processor remotely configures the configuration table in the multiport switch.

Siddiqui discloses a media gateway (MGW) that controls the routing of data packets through a “connectionless” packet-switched network without bearer channel control signaling. (Siddiqui, Abstract). The MGWs of Siddiqui include a port mapping table 230 that is used to associate a UDP port of a host MGW with

a UDP port of a remote MGW. (see Siddiqui, Fig. 2 and column 4, lines 59-62).

Siddiqui does not disclose or suggest each of the features recited in amended claim 1. Siddiqui, for example, does not disclose or suggest the host processor and the remote processor of claim 1, where the host processor is connected locally to the multiport switch and the remote processor remotely configures the configuration table in the multiport switch. Siddiqui discloses a port mapping table 230. Port mapping table 230, however, is not configured remotely by a remote processor. Instead, as is clearly disclosed by Siddiqui, the port mapping tables of Siddiqui are created and configured by their host MGWs. That is, port mapping table 230 of Siddiqui, which is shown in Fig. 2 as being stored in MGW 120-B, appears to be configured only by MGW 120-B. Siddiqui makes this particularly clear at column 5, lines 37-39, in which Siddiqui states, in reference to the "remote" MGW 120-A: "[t]he MGW 120-A is unaware of this mapping and, thus, does not know the destination UDP port address."

Applicants submit that a device that is unaware of a mapping into a mapping table could not possibly be said to correspond to a remote processor that remotely configures a configuration table in the multiport switch, as recited in claim 1.

In rejecting claim 1, the Examiner points to a number of sections of Siddiqui as allegedly corresponding to the remote processor recited in claim 1. In particular, the Examiner points to column 4, lines 15-35 and 55-62; and

column 5, line 1 through column 6, line 49 of Siddiqui. (Office Action, page 5).

These sections of Siddiqui generally describe the operation of MGW 120-B in updating port mapping table 230 to allocate resources for a call. As discussed above, however, the updating of port mapping table 230 by MGW 120-B in no way discloses or suggests, as is recited in amended claim 1, “a remote processor communicating with the multiport switch through the host processor using an IP address assigned to the multiport switch, the remote processor remotely configuring the configuration table in the multiport switch.”

Claim 1 also recites a “multiport switch connected to a plurality of subnets through ports of the multiport switch, each of the plurality of subnets being associated with a subnet Internet Protocol (IP) address, the multiport switch further including a configuration table storing associations between the subnet IP addresses and the ports of the multiport switch.” The Examiner contends that media gateway (MGW) 120-B corresponds to the multiport switch recited in claim 1. (Office Action, page 5). Applicants submit, however, that a media gateway is not equivalent to a multiport switch, as the term is generally used in the art, and certainly not a multiport switch connected to a plurality of subnets through ports of the multiport switch, as recited in claim 1. Siddiqui, in fact, never mentions the term subnet, much less a plurality of subnets connected through ports of a multiport switch.

For at least these reasons, Applicants submit that Siddiqui does not

disclose or suggest each of the features recited in amended claim 1.

Accordingly, the rejection of this claim is improper and should be withdrawn. At least by virtue of their dependency on claim 1, Applicants submit that the rejection of claims 2-5 and 7 are also improper and should be withdrawn.

Independent claim 8 and its dependent claims 9-11 also stand rejected based on Siddiqui. Applicants submit that Siddiqui also does not disclose or suggest each of the features of claim 8. Amended claim 8 is directed to a method of processing packets in a network device, including, among other things, allowing a remote processor to remotely configure a configuration table, the remote processor transmitting information to configure the configuration table using an IP address uniquely assigned to the network device. Siddiqui does not disclose or suggest any such feature. As discussed above, although Siddiqui discloses a MGW 120-B that includes a port mapping table 230, port mapping table 230 cannot be said to be configurable by a remote processor, and thus could not be said to disclose or suggest the features of amended claim 8, including allowing a remote processor to remotely configure a configuration table. In contradistinction, Siddiqui specifically states that MGW 120-A (the remote MGW to MGW 120-B) "is unaware of this mapping." (Siddiqui, column 5, lines 37-39).

For at least these reasons, Applicants submit that Siddiqui does not disclose or suggest each of the features recited in amended claim 8.

Accordingly, the rejection of this claim is improper and should be withdrawn. At least by virtue of their dependency on claim 8, Applicants submit that the rejections of claims 9-11 are also improper and should be withdrawn.

Independent claim 13 and dependent claims 14-17 also stand rejected based on Siddiqui. Applicants respectfully traverse these rejections.

Claim 13, as amended, is directed to a network device comprising a number of elements, including, for example, a configuration table storing associations between Internet Protocol (IP) addresses of subnets and output ports of the multiport switch, the configuration table being remotely updated to reflect configuration information received from a remote processor. Applicants submit that Siddiqui fails to disclose or suggest this aspect of the invention. As discussed above, although Siddiqui discloses a MGW 120-B that includes a port mapping table 230, port mapping table 230 is not configurable by a remote processor, and thus could not be said to disclose or suggest the features of amended claim 13.

For at least these reasons, Applicants submit that Siddiqui does not disclose or suggest each of the features recited in amended claim 13. Accordingly, the rejection of this claim is improper and should be withdrawn. At least by virtue of their dependency on claim 13, Applicants submit that the rejections of claims 14-17 are also improper and should be withdrawn.

Dependent claims 6, 12, and 18 stand rejected under 35 U.S.C. § 103(a)

based on Siddiqui in view of Tsuruoka. Applicants have reviewed Tsuruoka and submit that Tsuruoka does not cure the above-noted deficiencies of Siddiqui.

Accordingly, at least by virtue of their dependency from independent claims 1, 8, and 13, respectively, Applicants submit that the rejections of claims 6, 12, and 18 are improper and should be withdrawn.

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In view of the foregoing amendments and remarks, Applicants respectfully request withdrawal of the outstanding rejections and the timely allowance of this application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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